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United training Circuit

Document #1662527

UNITED STATES COURT OF APPEALS FOR THE D.C. CIRCUIT

Filed: 02 21 POT STATES LAURI OF APPEALS
FOR DISTRICT OF COLUMBIA CIRCUIT

APPEALS
FILED
FEB 21 2017

CLERK

LOCAL 58, INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS (IBEW), AFL-CIO (PARAMOUNT INDUSTRIES, INC.)

Petitioner

Case No.: 17-1058

v.

NLRB Case No.: 07-CB-149555

RYAN GREENE, an Individual

Respondent

MILLER COHEN, P.L.C.

Robert D. Fetter (P68816)
Attorney for Respondent

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FOUNDATION

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NATIONAL LABOR RELATIONS BOARD - Region 7

Robert Buzaitis, Counsel for the General Counsel

477 Michigan Avenue – Room 300

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PETITION FOR REVIEW

Respondent Local 58, International Brotherhood of Electrical Workers (IBEW), AFL-CIO (Paramount Industries, Inc.) hereby petitions the United States Court of Appeals for the D.C. Circuit for review of the Decision and Order of the National Labor Relations Board ("NLRB"), entered on February 10, 2017, in NLRB Case No. 07-CB-149555; 365 NLRB No. 30 (attached), by which the NLRB reversed the Administrative Law Judge's Decision and Order dated October 26, 2015.

Respectfully submitted,

MILLER COHEN, P.I.C.

By:

Røbert D. Fetter (P68816)

Attorney for Respondent 600 W. Lafayette Blvd., 4th Floor

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Dated: February 20, 2017

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DISCLOSURE STATEMENT

NOW COMES Respondent Local 58, International Brotherhood of Electrical Workers (IBEW), AFL-CIO (Paramount Industries, Inc.) and hereby presents the United States Court of Appeals for the D.C. Circuit a disclosure statement:

1. Is said party a subsidiary or affiliate of a publicly owned corporation? If yes, list below the identity of the parent corporation or affiliate and the relationship between it and the named party: No.

2. Is there a publicly owned corporation, not a party to the appeal, that has a financial interest in the outcome? If yes, list the identity of such corporation and the nature of the financial interest: No.

Respectfully submitted,

MILLER COHEN, P.L.C.

By:

Robert D. Fetter (P68816)
Attorney for Respondent

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Filed: 02/21/2017

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Dated: February 20, 2017

UNITED STATES COURT OF APPEALS FOR THE D.C. CIRCUIT

LOCAL 58, INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS (IBEW), AFL-CIO (PARAMOUNT INDUSTRIES, INC.)

	Petitioner	Case No.:
v.		
		NLRB Case No.: 07-CB-149555

RYAN GREENE, an Individual

Respondent MILLER COHEN, P.L.C. NATIONAL RIGHT TO WORK LEGAL DEFENSE Robert D. Fetter (P68816) **FOUNDATION** Attorney for Respondent Amanda K. Freeman, Esq. 600 W. Lafayette Blvd., 4th Floor 8001 Braddock Road, Suite 600 Springfield, VA 22151 Detroit, Michigan 48226 (313) 964-4454 Phone akf@nrtw.org (313) 964-4490 Fax rfetter@millercohen.com NATIONAL LABOR RELATIONS BOARD - Region 7 Robert Buzaitis, Counsel for the General Counsel 477 Michigan Avenue – Room 300 Detroit, MI 48226-2569 (313) 226-3200 Phone

PROOF OF SERVICE

(313) 226-2090 Fax

MARIA MACEWEN, an employee of MILLER COHEN, P.L.C., says that on *February 20, 2017*, she served a copy of **PETITION FOR REVIEW** and **DISCLOSURE STATEMENT**, along with this *Proof of Service*, upon:

Amanda K. Freeman, Esq.
NATIONAL RIGHT TO WORK LEGAL
DEFENSE FOUNDATION
8001 Braddock Road, Suite 600
Springfield, VA 22151

Mr. Robert Buzaitis,
Counsel for the General Counsel
NATIONAL LABOR RELATIONS BOARD,
REGION 7
477 Michigan Avenue, Room 300
Detroit, MI 48226-2569

via *U.S. First-Class Mail* by enclosing the same in a sealed envelope with first class postage fully prepaid, and by depositing the same in the United States Mail in Detroit, Michigan.

Subscribed and sworn to before me on this 20th day of February 2017

Diane Boxie, Notary Public Wayne County, MI My Commission Expires: 09/15/2020